

Exhibit “A”

w <edwardkerns@aol.com>
To: ddollingeresq@gmail.com
Cc: mkhourilaw.com
Thu, Dec 8, 2022 at 1:22 PM
Doug

It was a pleasure speaking to you this morning my time.

Per our discussion, this is to memorialize our agreement that you will send a letter to our judge indicating the following:

1. That we wish to place everything on hold while we pursue a voluntary exchange of discovery documents and proceed to mediation;
2. That all statutes of limitation in all states will be reserved and stayed;
3. That should mediation fail and we are required to proceed, we will have 30 days notice in which to make a special appearance or otherwise and bring a motion to dismiss/quash service of the complaint based on lack of jurisdiction or otherwise.

You have assured me that this will be approved by the Court. If not, please advise.

Again,

Thank you for your professionalism and extreme effort to work for the mutual benefit of our clients.

Sincerely,

Ed Kerns
Attorney for ADMI Incorporated